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13 Attorneys for Plaintiff
14 CHURCH OF SCIENTOLOGY INTERNATIONAL

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HUB LAW OFFICES

15 SUPERIOR COURT OF THE STATE OF CALIFORNIA

16 FOR THE COUNTY OF MARIN

17 CHURCH OF SCIENTOLOGY) CASE NO. 157 688
18 INTERNATIONAL, a California not-)
19 for-profit religious corporation;) NOTICE OF MOTION AND MOTION
20 Plaintiff,) TO COMPEL PRODUCTION OF
21) DOCUMENTS FROM DEFENDANT
22 vs.) THE GERALD ARMSTRONG
23) CORPORATION
24)
25 GERALD ARMSTRONG; MICHAEL WALTON;) DATE: January 21, 1993
26 THE GERALD ARMSTRONG CORPORATION,) TIME: 9:00 a.m.
27 a California for-profit) DEPT: 1
28 corporation; Does 1 through 100,)
inclusive,)
Defendants.) TRIAL DATE: None
DISCOVERY CUT OFF: None
MOTION CUT OFF: None

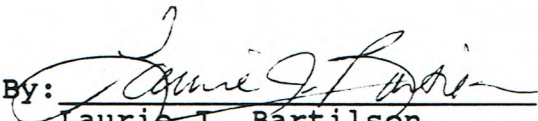
29 TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

30 PLEASE TAKE NOTICE that on January 21, 1993 at 9:00 a.m. in
31 Department 1 of the above-entitled court, located at the Hall of
32 Justice, 3501 Civic Center Drive, No. 151, San Rafael,
33 California, plaintiff CHURCH OF SCIENTOLOGY INTERNATIONAL ("the
34 Church") will and does hereby move, pursuant to C.C.P. §§ 2031(1)
35 and 2023(1), for an order compelling defendant GERALD ARMSTRONG

1 CORPORATION ("Armstrong Corporation") to produce documents for
2 inspection and copying, as requested in the Church's First
3 Request for the Production of Documents By Defendant Gerald
4 Armstrong Corporation. This motion is made on the grounds that
5 defendant has refused to produce any documents in response to the
6 Church's reasonable requests, producing instead a series of
7 objections which are evasive, meritless and interjected in bad
8 faith to impede discovery. This motion is based on this notice,
9 and the accompanying memorandum of points and authorities,
10 declaration of Andrew H. Wilson, and separate statement of
11 requests in dispute.

12 Dated: November 30, 1993

Respectfully submitted,
BOWLES & MOXON

14
15 By: 
16 Laurie J. Bartilson

17 Andrew H. Wilson
WILSON, RYAN & CAMPILONGO
18 Attorneys for Plaintiff
19 CHURCH OF SCIENTOLOGY
INTERNATIONAL
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